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BLOOD HURST & O'REARDON, LLP
Timothy G. Blood (CA 149343)
(Applicant for pro hac vice admission)
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*Attorneys for Jun Dam and the Class in
Dam v. Perkins Coie, LLP, et al.,
Case No. 2:20-cv-00464-SAB (E.D. Wash.)*

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, INC., a Washington
corporation,

Debtor.

Case No: 18-03197 FPC 7

Hon. Frederick P. Corbit
Chapter 7

**DECLARATION OF TIMOTHY G.
BLOOD IN SUPPORT OF MOTION
TO ADMIT *PRO HAC VICE***

[No Hearing Requested]

1 I, Timothy G. Blood, under penalty of perjury, declare the following
2 statements to be true and correct, based on my personal knowledge and
3 information:

4 1. I am the managing partner of Blood Hurst & O'Reardon, LLP, and
5 one of the attorneys of record for Creditor Jun Dam.

6 2. I make this declaration in support of the motion for my admission to
7 practice *pro hac vice* before this Court for the limited purpose of this litigation.

8 **A. Applicant's address and telephone number**

9 Blood Hurst & O'Reardon, LLP
10 501 West Broadway, Suite 1490
11 San Diego, CA 92101
12 Tel: (619) 338-1100

13 **B. Dates of admission to practice before other courts**

14 Mr. Blood is admitted to practice in the following courts:

- 15 • California State Courts as of 12/5/1990 (CA 149343)
- 16 • U.S. District Court, Southern District of California as of 12/5/1990
- 17 • U.S. District Court, Central District of California as of 12/2/1992
- 18 • U.S. District Court, Northern District of California as of 7/16/1997
- 19 • U.S. District Court, Eastern District of California as of 7/13/2003
- 20 • Ninth Circuit Court of Appeals as of 6/25/1997
- 21 • United States Supreme Court as of 1/25/2016
- 22 • United States Circuit Court of Appeals for the Second (4/11/2017),
23 Third (3/6/2008), Fifth (4/6/2000), Sixth (9/23/1999), Eighth
24 (4/20/2001) and Eleventh Circuits (8/4/2000)
- 25 • United States District Courts for the E.D. Arkansas (11/19/2003), W.D.
26 Arkansas (11/19/2003), N.D. Illinois (1/20/2016) and E.D. Michigan
27 (5/20/2010)

1 **C. Name, address and telephone number of associated admitted counsel**

2 Dennis McGlothin (WSBA No. 28177)
3 Western Washington Law Group PLLC
4 P.O. Box 468
5 Snohomish, WA 98291
6 Tel: 425/728-7296
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7 **D. Necessity for appearance by applicant**

8 I am one of the counsel for Plaintiff and the proposed Class in *Dam v.*
9 *Perkins Coie, LLP, et al.*, Case No. 2:20-cv-00464-SAB (E.D. Wash.) (the
10 "Class Action"). I have been admitted *pro hac vice* in the Class Action.

11 I am the managing partner of Blood Hurst & O'Reardon, LLP and
12 specializes in class action litigation. I have significant experience leading the
13 litigation of complex class action lawsuits. I have been appointed lead counsel by
14 numerous state and federal courts, including in complex and multidistrict
15 litigation.

16 On June 18, 2018, Mark D. Waldron, the chapter 7 trustee in this matter,
17 filed a motion for an order to show cause why nominal plaintiff Jun Dam should
18 not be sanctioned for violating the automatic stay by pursuing the Class Action
19 against non-debtors. ECF Nos. 889-90. Plaintiff's opposition to Trustee's motion
20 for an OSC is due July 22, 2021. I wish to appear and participate in this
21 proceeding, including to present oral argument if permitted.

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1 **E. Disciplinary actions or sanctions**

2 I have no pending disciplinary sanction or actions and have never been
3 subject to disciplinary sanctions by any court or Bar Association.

4 I declare under penalty of perjury under the laws of the United States of
5 America and the state of Washington, that the foregoing is true and correct.

6 Respectfully submitted this 22nd day of July, 2021.

7
8 s/ Timothy G. Blood

9 Timothy G. Blood, Applicant for
10 *pro hac vice* admission

11 Blood Hurst & O'Reardon, LLP

12 501 West Broadway, Suite 1490

13 San Diego, CA 92101

14 Tel: 619/338-1100

15 tblood@bholaw.com

16 *Attorneys for Jun Dam and the Class in*
17 *Dam v. Perkins Coie, LLP, et al., Case No.*
18 *2:20-cv-00464-SAB (E.D. Wash.)*

CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will in turn automatically generate a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF System. The NEF for the foregoing specifically identifies recipients of electronic notice.

Executed on July 22, 2021.

s/ Dennis McGlothlin

DENNIS J. MCGLOTHIN